

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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DOMUS BWW FUNDING, LLC	:	Bky. No. 22-11162(ELF)
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Debtor	:	
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In re:	:	CHAPTER 11
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1801 ADMIN, LLC	:	Bky. No. 22-11163(ELF)
	:	
Debtor	:	
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**MOTION FOR ENTRY OF AN ORDER EXTENDING DEBTORS'
TIME TO FILE SCHEDULES AND STATEMENTS
OF FINANCIAL AFFAIRS PURSUANT TO FED. R. BANKR. P. 1007(c)**

Domus BWW Funding, LLC and 1801 Admin, LLC (collectively, the “Debtors”), by and through their proposed counsel, Karalis PC, hereby respectfully represent:

INTRODUCTION AND JURISDICTION

1. This motion seeks entry of an Order extending for an additional fourteen (14) days the time within which the Debtors must file their schedules of assets and liabilities (the “Schedules”) and statements of financial affairs (the “SOFA’s”) pursuant to Fed. R. Bankr. P. 1007(c) (the “Motion”).

2. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157(b) and 1334. This matter is a “core” proceeding within the meaning of 28 U.S.C. § 157(b)(A) and (O).

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1409(a).

BACKGROUND

4. On May 3, 2022 (the “Petition Date”), the Debtors filed voluntary petitions for relief pursuant to Chapter 11 of Title 11, United States Code (the “Bankruptcy Code”).

5. Since the Petition Date, the Debtors have remained in possession of their assets and continued management of their businesses as debtors-in-possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code.

6. A description of the Debtors' businesses and the facts precipitating the filing of their Chapter 11 proceedings is set forth in the Declaration of Paul Halpern in Support of First Day Motions. Those facts, to the extent relevant, are incorporated herein by reference.

RELIEF REQUESTED AND BASIS THEREFOR

7. Pursuant to Fed. R. Bankr. P. 1007(c), the Debtors' Schedules and SOFA's must be filed no later than fourteen (14) days after the Petition Date, i.e., May 17, 2022.

8. Prior to the Petition Date, the Debtors and their professionals have focused on numerous tasks relating to these Chapter 11 cases, including: (a) reviewing financial information; (b) reviewing documents related to various litigation commenced against the Debtors; (c) addressing issues relating to the Debtors' various financial obligations; (d) preparing the Debtors' various "First Day Motions"; and (e) retention of professionals required by the Debtors to assist them in the bankruptcy process.

9. The collection of information necessary to complete the Debtors' Schedules and SOFA's will require the expenditure of substantial time and effort on the part of the Debtors' management and many of Debtors' employees. The Debtors are working diligently to gather the necessary information; however, given the complex nature of the Debtors' business affairs and the need to continue to operate the Debtors' businesses while the necessary information is being compiled, the Debtors simply are unable to complete the preparation of the Schedules and SOFA's in order to allow such documents to be filed within fourteen (14) days of the commencement of these Chapter 11 cases.

10. As a result of those and other factors, the Debtors and their professionals have yet to fully complete the Schedules and SOFA's and anticipate that such documents may not be completed by the deadline established by Fed. R. Bankr. P. 1007(c). Rather than filing incomplete schedules that would have to be amended at a later date, the Debtors seek a limited extension of time to complete that task.

11. Fed. R. Bankr. P. 1007(c) provides, in relevant part, that the Schedules and SOFA's must be filed within fourteen (14) days after the filing of a Chapter 11 petition. That deadline may be extended, however, on motion "for cause shown." *See*, Fed. R. Bankr. P. 1007(c). The Debtors respectfully submit that, based on the foregoing, cause exists to grant a fourteen (14) day extension of the fourteen-day deadline under Rule 1007(c). Accordingly, the Debtors respectfully request an extension to and including May 31, 2022 to file their Schedules and SOFA's.

WHEREFORE, the Debtors respectfully request that the Court grant the Motion and for such other relief as the Court deems just and appropriate under the circumstances.

Respectfully submitted

KARALIS PC

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Proposed Attorneys for the Debtors

Dated: May 9, 2022